



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105

May 4, 2015

Ms. Teresa Bresler
Navy Facilities Engineering Command Southwest
2730 McKean Street, Building 291
San Diego, California 92136

Subject: EPA Comments on the Navy Base Coronado Coastal Campus Final Environmental
Impact Statement, San Diego, California (CEQ #20150086)

Dear Ms. Bresler:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement and provided comments to the Navy on September 15, 2014, rating the DEIS as Environmental Concerns - Insufficient Information (EC-2). This rating was based on the lack of discussion of potential climate change effects on the project, since the proposed location is on a low-lying coastal peninsula that currently experiences flooding and sea-water infiltration and would be vulnerable to climate change effects, particularly sea-level rise when coupled with increased incidence and severity of winter storms, storm surges, and erosion.

We appreciate the additional information in the climate change discussion regarding sea level rise and the inclusion of maps depicting sea level rise estimates on the project site through 2100 (p. 4-12 through p. 4-16). The FEIS concludes that no climate change-related sea level rise impacts would be anticipated at the proposed facilities through the year 2050, and that after 2050, the southern portion of the project site within the Wullenweber Antenna Array area would be inundated under the 4-foot rise by 2100 (p. 4-17). More information is present in the Federal Coastal Consistency Determination in Appendix E2, which predicts that the proposed project would be safe from inundation through 2083 with an assumed 3 feet of mean sea level rise, which represents a 'moderate' scenario for future sea level rise, but does not include the added effects of erosion or episodic high water levels (App. E2, p. 38).

We note that the Navy proposes to defer climate change-related design changes to the future, should the need arise, stating in the FEIS that "the DoD and Navy will regularly reevaluate climate change risks and opportunities in order to develop policies and plans to manage its effects" (p. 4-17). The Navy conveyed that should coastal armoring need to occur in the future, it would require federal consistency review and NEPA documentation at that time. Since coastal armoring can have adverse impacts on coastal ecosystems, we encourage the Navy to consider whether any features could reasonably be incorporated into the proposed project at this time that could reduce the potential need for coastal armoring in the future.

EPA appreciates the opportunity to review this FEIS. We would appreciate receiving a copy of the Record of Decision when it is available. If you have any questions, please contact me at 415-972-3521, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

A handwritten signature in purple ink, appearing to read "Kathleen Martyn Goforth".

Kathleen Martyn Goforth, Manager
Environmental Review Section

cc: Michael Hornick, Federal Emergency Management Agency
Joseph Street, California Coastal Commission